

8042-2-4 111

INFORMATION: Policy on Exit Emergency Exit Marking
Requirements; ACE-115W cc Mail of 2/5/97

2/10/97

Manager, Standards Office, ACE-110

Associate Manager, Wichita Aircraft Certification Office, ACE-118W

Your cc:mail message of February 5, 1997, requests clarification of the requirements of Title 14 Code of Federal Regulations, Part 23, Sections 23.811(a) and 23.1557(d). I believe we are both in agreement as to the intent of Section 23.811(a) in that it is quite specific regarding the requirements for external markings of emergency exit doors.

The question regarding the applicability of Section 23.1557(d) to the inside or outside of the airplane, is not as easy to determine since the regulation does not specifically refer to the exterior or interior of the airplane. Review of previous regulations showed that this particular regulation first appeared in CAR 03.6222. on December 15, 1946. Very few wording changes have occurred to this regulation since its inception.

Section 23.811(a) is specifically intended to be applicable to exterior emergency exit markings and placards. It does not stipulate the color of these markings and placards, with the exception that they must be conspicuously identifiable from outside the airplane. Section 23.1557(d) specifically requires that each placard and operating control for each exit must be red. Furthermore, a placard must be near each emergency exit control and must clearly indicate the location of that exit and its method of operation.

Since the emergency exit exterior markings are conspicuously identifiable from the outside of the airplane, to further require red placards that indicate the location of these exits, does not make sense. There might be instances where the red placard may not be conspicuously identifiable due to the exterior color of the fuselage. AC 23.807-3 gives further guidance regarding adding external markings to emergency exits. Not one of the recommendations made in this AC specifies the use of red placards. Other subparagraphs of Section 23.811 require the use of red markings when the subject involves the interior of the airplane. Therefore, being consistent with these facts, we interpret the intent of Section 23.1557(d) to be applicable to the interior of the airplane.

In future rulemaking activities, it is planned to amend sections 23.1557(d), 23.807, and 23.811 so that all the emergency exit marking requirements would be in one section. This action would eliminate the confusion of having emergency exit marking requirements in several sections.

If you should need any additional information regarding this issue please call Mike Downs, telephone number (816)-426-5688.

/s/Larry D. Malir
for
John R. Colomy

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Reviewed:MONROE:2/10/97